

Mr. Michael Troyanovich
Corporate Secretary and General Counsel
One Titan / Titan International, Inc.
201 Spruce Street
Quincy, Illinois 62301

Re: Administrative Order, Docket No. 86-F0011
Dico's Performance Evaluation Report No. 29
Des Moines TCE Site, Des Moines Iowa

Dear Mr. Troyanovich:

The U.S. Environmental Protection Agency has received and reviewed Dico's revised Performance Evaluation Report No. 29 received on May 29, 2016 and the corrected figures, received on X/X/2016. The EPA approves the report with the enclosed comments. While no revisions are necessary to the revised report, please review the comments prior to submitting the next report as the EPA does not agree with a few of Dico's statements.

If you have questions regarding this or any other issue pertaining to this site, do not hesitate to contact me at (913) 551-7977 or by e-mail at mccoy.erin@epa.gov.

Sincerely,

Erin S. McCoy, P.G.
Remedial Project Manager
Iowa/Nebraska Remedial Branch
Superfund Division

Enclosure

cc: Mr. Brian Mills, Dico
Mr. Gazi George, Dico
Mr. Ty Steinman, Dico
Mr. Hylton Jackson, INDR
Mr. Vern Rash, DMWW

Comments on Performance Report No. 29
Dated May 29, 2016

General Comments

Comment #1 – Section 1 states that *...in addition to the operating recover wells, it can be shown the recovery wells have effectively limited the offsite migration of the dissolved phase constituents, so much so that it has become practically and financially non-feasible to continue this pace of minimal contaminant mass recovery and increasing operating costs hence alternative remedial technologies are necessary to avoid the cost per gallon recover of TCE.* While EPA agrees that this may be the case, an alternative technology cannot be deemed more appropriate for the site or implemented until additional work is performed to support a ROD amendment and the ROD is amended. If Dico wants to pursue an alternative remedial action for operable unit 1, Dico should submit a work plan to EPA for review and approval that outlines what additional work Dico will perform and what alternatives technologies will be reviewed.

Comment #2 – Section 3 indicates the spillway flashboards increase hydrostatic pressure of the river to groundwater (i.e., the river loses water to groundwater). The EPA concurs. The report further indicates that an established hydraulic barrier exists, eliminating the likelihood of contaminants migrating toward the river. According to the 1986 Feasibility Study (FS), a significant difference exists between the river bed and alluvial sediments which indicates that, under a scenario where the south gallery is pumping (valve no. 3 closed, north gallery not in use, flashboards up/down), drawdown in the north gallery occurs. Due to this, it is unclear to what extent groundwater east of the river is induced west. The EPA recommends that piezometers be installed to determine groundwater flow paths affected by induced recharge and use of the southern gallery.

Comment #3 – Section 4 states that groundwater samples are analyzed for an abbreviated list. During the field work performed the week of June 6, 2016, separate phase product was observed under building 1 and the northwest portion of building 2. Once the analytical is back and if the separate phase product is identified, EPA may approach Dico about expanding the VOC list in the wells monitored around these areas to determine the extent of contamination or to perform additional work to identify the product.

Comment #4 – Page 7 states that *Dico will solicit USEPA to conduct some feasibility studies for alternative long term, more economical alternatives in lieu of the current discussion with USEPA and the City of Des Moines regarding the future of the site and its development potential.* As outlined in CERCLA, any additional work to identify potential alternative remedial actions will need to be performed by Dico, unless Dico can negotiate this during any potential negotiations with EPA and/or the City of Des Moines.